

REMARKS

Claims 1-55 remain pending in the application.

The Applicants respectfully request the Examiner to reconsider earlier rejections in light of the following remarks. No new issues are raised nor is further search required as a result of the changes made herein. Entry of the Amendment is respectfully requested.

Claims 1-6, 9, 12, 13, 23, 24, 29 and 36-53 over Kung

In the Office Action, claims 1-6, 9, 12, 13, 23, 24, 29 and 36-53 were rejected under 35 U.S.C. §102(e) as allegedly being anticipated by U.S. Patent No. 6,826,173 to Kung ("Kung"). The Applicants respectfully traverse the rejection.

Claims 1-6, 9, 12, 13, 23, 24, 29 and 36-53 recite a system and method of retrieving a station ID of a client device from any of customer information, customer ID and device ID previously stored within a message router.

The Examiner ACKNOWLEDGES that Kung allegedly discloses "preference data is the user specified information detailing where the user wants the call to do, and the terminal configuration data is information about the devices connected to the broadband residential gateway and specify which device can receive which type of call, and Column 13, lines 15-24, where the preference data is stored previously on a database obtained easy by the router (Call manager)".

The Examiner acknowledges that Kung allegedly discloses preference data that is previously stored on a data easily obtained by a router. Thus, the Examiner ACKNOWLEDGES that Kung fails to disclose information stored within a router, much less disclose customer information, customer ID and device ID stored within a message router, as recited by claims 1-6, 9, 12, 13, 23, 24, 29 and 36-53.

Moreover, even if Kung disclosed preference data stored within a router, which the Examiner acknowledges that Kung fails to do, a thorough reading of Kung appears to verify the Examiner's allegation that Kung's

preference data details "where the user wants the call to do, and the terminal configuration data is information about the devices connected to the broadband residential gateway and specify which device can receive which type of call". Thus, Kung fails to disclose retrieving a station ID of a client device from another type of information, much less retrieving a station ID of a client device from another type of information stored within a message router, much less disclose a system and method of retrieving a station ID of a client device from any of customer information, customer ID and device ID previously stored within a message router, as recited by claims 1-6, 9, 12, 13, 23, 24, 29 and 36-53.

Hence, the rejection should be withdrawn because it fails to demonstrate that the applied reference discloses each and every element of the claim, as discussed above. See MPEP 2131. "The identical invention must be shown in as complete detail as is contained in the ... claim." Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). "Anticipation cannot be predicated on teachings in the reference which are vague or based on conjecture." Studiengesellschaft Kohle mbH v. Dart Industries, Inc., 549 F. Supp. 716, 216 USPQ 381 (D. Del. 1982), aff'd., 726 F.2d 724, 220 USPQ 841 (Fed. Cir. 1984).

The Examiner argues in the Response to Arguments section of the Office Action that Applicant previously argued that Kung fails to disclose storing a customer ID, device ID, and Station ID at a message router previous to a communication (See Office Action, page 12). The Applicants respectfully disagree.

Applicant previously argued and argued AGAIN herein that Kung fails to disclose retrieving a station ID from another type of information, much less another type of information previously stored within a message router. Thus, it is clear from the Examiner's comments that the Examiner is NOT fully considering the claimed features, which the Examiner ACKNOWLEDGES that Kung fails to disclose.

A benefit of retrieving a station ID of a client device from any of customer information, customer ID and device ID previously stored within a

message router is, e.g., providing an alert to more stations. In many instances, an alert service may want to send an alert to stations without knowing all of the station IDs of stations and their associated station IDs attached to a network. Conventionally, alerts are only able to be sent to stations with station ID known **in advance**. However, an alert source may want to target additional stations. By retrieving a station ID of a client device from any of customer information, customer ID and device ID previously stored within a message router, an alert can be sent to stations **without knowing in advance** station IDs. The cited prior art fails to disclose or suggest the claimed features having such benefits.

Accordingly, for at least all the above reasons, claims 1-6, 9, 12, 13, 23, 24, 29 and 36-53 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claims 14-22 and 30-35 over Kung in view of Archer

In the Office Action, claims 14-22 and 30-35 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Kung in view of U.S. Patent No. 6,683,870 to Archer ("Archer"). The Applicants respectfully traverse the rejection.

Claims 14-22 and 30-35 recite a system and method of retrieving a station ID of a client device from any of customer information, customer ID and device ID previously stored within a message router.

Archer is relied on to disclose sending a message to a device that is considered active and to send a message to all device that a subscriber has in his account (See Office Action, page 7).

Thus, Kung modified by the disclosure of Archer would STILL fail to disclose or suggest a system and method of retrieving a station ID of a client device from another type of information, much less retrieving a station ID of a client device from any of customer information, customer ID and device ID previously stored within a message router, as recited by claims 14-22 and 30-35.

Thus, Kung theoretically modified by the disclosure of Boyle would STILL fail to disclose or suggest retrieving a station ID of a client device from any of customer information, customer ID and device ID previously stored within a message router, as recited by claims 14-22 and 30-35.

Moreover, Claims 14-20 and 31-35 recite a system and method relying on a device ID that can be set to all devices.

The Office Action acknowledges that Kung fails to disclose an alert that includes an active device only flag and a device ID set to all devices (See Office Action, page 7). The Office Action relies on Archer to allegedly make up for the deficiencies in Kung to arrive at the claimed features. The Applicants respectfully disagree.

The Examiner ACKNOWLEDGED that Archer discloses sending a message to all devices that a subscriber has added to his account. Thus, the Examiner ACKNOWLEDGED that Archer simply discloses sending a message to all devices specified within an account NOT setting any type of device ID to all devices, as recited by claims 14-20 and 31-35.

Accordingly, for at least all the above reasons, claims 14-22 and 30-35 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claims 7, 8, 25, 26, 43, 44, 54 and 55 over Kung in view of Boyle

In the Office Action, claims 7, 8, 25, 26, 43, 44, 54 and 55 were rejected under 35 U.S.C. §102(e) as allegedly being obvious over Kung in view of U.S. Patent No. 6,138,158 to Boyle et al. ("Boyle"). The Applicants respectfully traverse the rejection.

Claims 7, 8, 25, 26, 43, 44, 54 and 55 recite a system and method of retrieving a station ID of a client device from any of customer information, customer ID and device ID previously stored within a message router.

The Examiner relies on Boyle to allegedly make up for the deficiencies in Kung to arrive at the claimed features. The Applicants respectfully disagree.

The Office Action acknowledges that Kung fails to disclose segmenting an alert with a selected protocol gateway into message segments before sending the alert over a network and having the client reconstruct the message segments (See Office Action, page 11). The Office Action relies on Boyle at col. 13, lines 37-48 to allegedly make up for the deficiencies in Kung to arrive at the claimed features. The Applicants respectfully disagree.

Boyle discloses at col. 13, lines 37-48 segmenting a PUSH PDU into a sequence of fragments, each being treated as a short message with a length no more than the maximum length allowed in a SMSC. However, Boyle, like Kung, fails to disclose or suggest retrieving of a station ID from **another type of information**, much less disclose or suggest retrieving a station ID from any of customer information, customer ID and device ID, much less retrieving a station ID of a client device from any of customer information, customer ID and device ID previously stored within a message router, as recited by claims 7, 8, 25, 26, 43, 44, 54 and 55.

Thus, Kung theoretically modified by the disclosure of Boyle would STILL fail to disclose or suggest retrieving a station ID of a client device from any of customer information, customer ID and device ID previously stored within a message router, as recited by claims 7, 8, 25, 26, 43, 44, 54 and 55.

Accordingly, for at least all the above reasons, claims 7, 8, 25, 26, 43, 44, 54 and 55 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claims 10, 11, 27, 28, 46 and 47 over Kung in view of Ramasubramani

In the Office Action, claims 10, 11, 27, 28, 46 and 47 were rejected under 35 U.S.C. §102(e) as allegedly being obvious over Kung in view of U.S. Patent No. 6,507,589 to Ramasubramani et al. ("Ramasubramani"). The Applicants respectfully traverse the rejection.

Claims 10, 11, 27, 28, 46 and 47 recite a system and method of retrieving a station ID of a client device from any of customer information, customer ID and device ID previously stored within a message router.

The Office Action acknowledges that Kung fails to disclose returning an acknowledgement from a client to a protocol gateway and then forwarded to a server (See Office Action, page 11). The Office Action relies on Ramasubramani at col. 8, lines 20-35 to allegedly make up for the deficiencies in Kung to arrive at the claimed features. The Applicants respectfully disagree.

Ramasubramani at col. 8, lines 20-35 discloses an Internet receive process and a deliver process, the deliver process waiting for an acknowledgement that a notification was received and may also retry the sending as needed. However, Ramasubramani, like Kung and Boyle, fails to disclose or suggest retrieving of a station ID from **another type of information**, much less disclose or suggest retrieving a station ID of a client device from any of customer information, customer ID and device ID previously stored within a message router, as recited by claims 10, 11, 27, 28, 46 and 47.

Thus, Kung modified by the disclosure of Ramasubramani would STILL fail to disclose or suggest retrieving a station ID of a client device from any of customer information, customer ID and device ID previously stored within a message router, as recited by claims 10, 11, 27, 28, 46 and 47.

Accordingly, for at least all the above reasons, claims 10, 11, 27, 28, 46 and 47 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Conclusion

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,



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